

Environmental Quality Services
(602) 379-6750

JUN 21 1995

Ms. Loretta K. Barsamian
Chief, Drinking Water Protection Branch
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Re: Administrative Order Regarding Past and Present Contaminant
Activities at the Bureau of Indian Affairs (BIA) Eastern
Nevada Agency Roads Shop Facility (Facility) Located in
Owyhee, Nevada, Docket No. UIC-EO-95-001

Dear Ms. Barsamian:

We are in receipt of your letter dated June 16, 1995. In response
to your transmittal, we offer the following:

In conformance with Paragraph 17 of the subject order (Order), BIA
Eastern Nevada Agency staff have been directed to: (1) cease any
discharge to the Facility floor drain; and (2) cease any discharge
of fluids which may potentially contain petroleum constituents onto
unlined dirt areas of the Facility.

As we understand, there was and is only one drain line that leads
to the former well located west of the Facility. This drain line
begins at the Facility floor drain located in the south, center
area of the Facility foundation and terminates at an approximate
depth of three feet at the former location of the well.

Since water runoff from rain events has the ability to enter the
Facility floor drain, we are currently investigating ways to
temporarily seal the drain so as not to hamper future investigative
efforts as described in the Order.

As an update, we have performed the following associated with
Paragraphs 4, 8 and 41 of the Order:

1. Paragraph 4: The materials in the floor drain have been
removed and are presently contained in five 55-gallon drums with
85-gallon overpacks.

2. Paragraph 8: These materials have been characterized, consolidated, packaged, and labeled.

3. Paragraph 41: Through a BIA contract, MSE, Inc. has performed characterization, packaging, and labeling of materials discussed in Paragraphs 4 and 8. We have forwarded the analytical data concerning materials in the floor drain, samples SYD-801 and SYD-802, to MSE, Inc. for their review and inclusion into their report. MSE, Inc. will be providing a documentation report to us describing the recommended disposition of the above mentioned materials with associated cost estimates. Pertinent elements of this documentation report will be incorporated into the Work Plan.

Also, since our receipt of the EPA letter dated April 10, 1995 from Ms. Patricia D. Eklund, Chief, Office of Underground Storage Tanks (OUST), Phoenix Area Office (PAO) Facilities Management has forwarded an initial funding request memorandum dated April 28, 1995 to BIA Facilities Management and Construction Center.

Our tentative planned approach is as follows: First, we are providing written certification that discharge as described by Paragraph 17 of the Order has ceased. Also, we are pursuing funding to accomplish the work. Second, we plan to develop one Scope of Work which will, as feasible, encompass provisions of Paragraphs 21 through 45 of the Order and the April 10, 1995 EPA OUST letter. We believe inclusion of all these tasks is necessary for two reasons: (1) Contracting the work is time consuming, thus one contract is preferable; and (2) in order to maintain consistency and efficiency, one Contractor is preferable. This Scope of Work will essentially act as the Work Plan, although the selected Contractor will be required to complete the Work Plan as a submittal in accordance with the specifications of the Scope of Work. Third, this Scope of Work, or portions thereof, will be transmitted to EPA and representatives of the Duck Valley Shoshone-Paiute Tribes for review and approval. Fourth, the contract will then be awarded and the work will proceed. Fifth, results from this work will then be reviewed. At this time, the remaining issues will be discussed in order to determine the next plan of action.

With each transmittal, we will identify any current concerns we may have. To assist in the development of the Scope of Work, please clarify the definition of "site" as mentioned in the Order.

We will strive to meet the time requirements as identified in the Order.

I certify under penalty of law that this letter was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the persons directly responsible for gathering the information, I certify that the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the

possibility of fine and imprisonment for knowing violations.

If you have any comments, questions, concerns, or require further information, please contact Mr. John Krause, PAO Hazardous Waste Coordinator at (602) 379-6750.

Sincerely,

15/ Frank Jones

Acting Area Director

cc: Ms. Cynthia Sans
Ms. Alisa Wong
Drinking Water Protection Branch
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105
Ms. Patricia Eklund
Chief, Office of Underground Storage Tanks
U.S. EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105
Mr. Lindsey Manning, Chairman
Mr. Bill Beck, Environmental Protection Specialist
Duck Valley Shoshone-Paiute Tribes
P.O. Box 219
Owyhee, Nevada 89832
Mr. Ed Decker
MSE, Inc.
3350 Americana Terrace, Suite 330
Boise, Idaho 83706
Mr. Dan Kennedy
MSE, Inc.
330 Shoup Avenue, Suite 201
Idaho Falls, Idaho 83402
Superintendent, Eastern Nevada Agency
Area Facilities Management
Attention: Charles Thomas
Attention: Bhailal Patel
Area Roads
Attention: Vernon Palmer
Area Contracts
Attention: Bud Brown
Director, Office of Trust Responsibilities
Attention: Chief, Environmental Services
Director, Office of Construction Management
Attention: Kurt Gerner
Facilities Management and Construction Center
Attention: Cliff Mahooty

Mr. William McConkie
Office of the Field Solicitor
Salt Lake City Field Office
125 South State Street
Salt Lake City, Utah 84138